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Norman H. Bangerter, Governor Dee C. Hansen, Executive Director Dianne R. Nielson, Ph.D., Division Director

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December 12, 1987

Mr. Roy Benson
Area Manager, Keigley Quarry
and Iron Ore Mines
Geneva Steel
P.O. Box 20-B, RFD #1
Santaguin, Utah 84655

Dear Mr. Benson:

Re: Initial Review of Mining and Reclamation Plan, Keigley Quarry, M/049/001, Utah County

The Division has completed its review of your Mining and Reclamation Plan received November 30, 1987. While the proposed plan is generally acceptable, several areas of the application require modification before the Division can proceed with tentative approval.

The following review comments are referenced back to the page and question number of your original application. The rule number in parentheses references the section of the Mined Land Reclamation Act Rules addressed by each question.

Section VI, Variances, page 9 (Rule M-10)

A highwall variance for the north walls is hereby granted. The highwalls have shown themselves to be stable over the past 30 years and there does not appear to be a practical means to reduce the 60 degree angle.

An impoundment variance for the pit floors is hereby granted. Surface runoff water routed to the pit floors is ephemeral in nature and ponded water is rapidly lost to seepage and evaporation. No adverse impacts to local groundwater systems are anticipated.

Section VII, Surety, Page 10 (Rule M-5)

Reclamation of the topsoil borrow area and the waste disposal area should be included in the reclamation estimate. All unit costs should be justified.

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The enclosed surety policy has a section titled "Calculating the Amount of Surety". These guidelines should be used in preparing the reclamation estimate (note: the proposed surety policy is still under review by the Board of Oil, Gas and Mining, and there may be changes made to the policy before it is finalized). An annual inflation factor of two percent is currently being used.

Section V, Reclamation Plan, pages 7-9 (Rule M-10)

Item 3(b) - Backfilling and Grading - The dump configuration shown in drawing No. Y-6669, Typical Cross Section, Dump Regrading, Keigley Quarry, is unacceptable for final reclamation. Given the possibility that a major portion of the dump may not be consumed for processing as projected, Geneva must provide a written commitment to reduce the dump faces to a gentler slope. The Division recommends regrading the dump faces and all other disturbed areas to a 2(H):1(V) slope (26 1/2 degrees) or less in order to provide for erosion control, slope stability, and successful revegetation.

Item 3(c) - Soil Material Replacement. The topsoil borrow area should be specifically included in the area to be revegetated.

Confidential Information, page 10.

The application indicates that confidential information relating to the location, size, or nature of the deposit is enclosed. Please identify the material you wish to have protected as classified so that we may secure it in a separate file.

Please address the above concerns before January 29, 1988. Thank you for your cooperation in this permitting matter. Should you have any questions or concerns, please contact me or Dave Wham.

Sincerely,

L. P. Braxton Administrator

1. P. Bruton

Mineral Resource Development and Reclamation Program

0851R, 96 cc: D. Wham F. Filas